

Stanley Kremen (*pro hac vice pending*)
Solomon Radner (283502018)
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Attorneys for Plaintiff

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. Peter Cho);
et al.,

Defendants.

)
) Civil Action No. 2:23-cv-03709-JMV-JRA
)
) **NOTICE OF PLAINTIFF’S**
) **MOTION FOR PRO HAC VICE**
) **ADMISSION OF COUNSEL**
)
) ***DOCUMENT FILED***
) ***ELECTRONICALLY***
)
) **RETURN DATE: Date to be set by the**
) **Court**

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, attorney for Plaintiff Trutek Corp. (“Plaintiff”), shall appear before this Court, U.S.D.J., **Martin Luther King Building & U.S. Courthouse**, 50 Walnut Street, Newark, NJ 07102, and shall move this Court for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting Stanley H. Kremen, Esq., member in good standing of the California State Bar, as counsel *pro hac vice* in this matter.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Plaintiff shall rely upon the Application and Certification of Solomon Radner, Esq., and Declaration

of Stanley H. Kremen, Esq. A proposed form of Order is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests that their application be considered for a ruling on papers only.

Dated: July 26, 2023

Respectfully Submitted,

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Solomon Radner
Solomon Radner, Esq.

STATEMENT IN LIEU OF BRIEF PURSUANT TO L.CIV.R. 7.1(c)(1)

Pursuant to Local Civil Rule 7.1(c)(1), Plaintiffs submit this Statement in lieu of the submission of a formal brief in support of their application for the admission *pro hac vice* of co-counsel. Inasmuch as the admission of counsel *pro hac vice* under the terms of Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and until any opposition to the within motion is filed with the Court by defendant herein, it is respectfully submitted that no brief in support of the within motion is necessary at this time.

Dated: July 26, 2023

Attorneys for Plaintiff,

By: /s/ Solomon Radner
Solomon Radner, Esq.
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33228 West 12 Mile Road, Suite 375
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Attorneys for Plaintiff

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,)	
)	Civil Action No. 2:23-cv-03709-JMV-JRA
)	
<i>Plaintiff,</i>)	APPLICATION AND CERTIFICATION
v.)	OF SOLOMON RADNER IN SUPPORT
)	OF THE PRO HAC VICE ADMISSION
YEONG WAN CHO (a.k.a. Peter Cho);)	OF COUNSEL STANLEY KREMEN,
et al.,)	ESQ.
)	
<i>Defendants.</i>)	DOCUMENT FILED
)	ELECTRONICALLY
)	

SOLOMON RADNER, of full age, hereby certifies as follows:

1. I am Of Counsel of the Law Office of Keith Altman, 33228 West 12 Mile Road, Suite 375, Farmington Hills, MI 48334. I am admitted to practice before the State Courts of New Jersey (283502018) and Michigan (P73653); the United States District Courts for the District of New Jersey, Eastern Michigan, Western Michigan, Northern Ohio, Western Texas, and Maryland; and in the Fifth, Sixth and Eleventh United States Circuit Courts of Appeals. I am a member in good standing in each of these bars. I presently am not the subject of any disbarment or suspension proceeding before this or any Court.

2. I submit this Certification in support of the application by Plaintiff Trutek Corp., for admission *pro hac vice* of Stanley Kremen, Esq. and of Counsel to the law firm, Law Office of Keith Altman, 33228 West 12 Mile Road, Suite 375, Farmington Hills, MI 48334, to appear in this action as counsel for Plaintiff.

3. Pursuant to Local Civil Rule 101.1, I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by or for me. Further, I agree to promptly notify the attorneys admitted *pro hac vice* of the receipt of all notices, Orders and pleadings.

4. On behalf of Plaintiff, I respectfully request that the Court grant its application to have Stanley Kremen, Esq., admitted *pro hac vice* to appear and participate as their counsel in this matter pursuant to Local Civil Rule 101.1(c).

Dated: July 26, 2023

Respectfully Submitted,

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Solomon Radner
Solomon Radner, Esq.